

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 22-cr-20519

v.

HON. PAUL D. BORMAN

D-1 CORTEZ BLAKE,  
D-2 KARAMOH TURNER,  
D-3 SEMAJ AYERS,  
D-4 MAIJAH GREENE,  
D-5 SHATONNIA KIMBROUGH, and  
D-6 ARMOND WILLIAMS,

Defendants.

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**United States' Written Proffer in Support of Motion for Detention**

The coordinated effort to victimize and seek retaliation in this case is stunning. Beginning on November 14, 2021, and continuing into November 15, 2021, the defendants joined other unnamed individuals in the kidnapping and beating of a person as part of an organized effort to extract information about a carjacking the conspirators wrongly believed the victim took part in.

On October 12, 2022, a federal grand jury indicted the defendants with one count of kidnapping in violation of 18 U.S.C. § 1201(a)(1) and one count of kidnapping (conspiracy) in violation of 18 U.S.C. § 1201(c). *See* ECF No. 1. The United States has moved for a detention hearing for the defendants because the

counts in the indictment each carry a sentence of up to life imprisonment. *See* 18 U.S.C. § 3142(f)(1)(B). The United States submits that for each defendant there is not a condition or combination of conditions that can be fashioned that will reasonably assure the appearance of such person as required and the safety of any other person and the community. *See* 18 U.S.C. § 3142(b).

The United States files this written proffer to provide the Court with information relating to the defendants' motive and opportunity to coordinate retaliatory gang violence against those perceived to have wronged them, all of which relate to the danger to the community if the defendants are released on bond. It will supplement this written proffer with additional proffered facts relating to the facts surrounding violent month of November 2021 during the detention hearing. The United States will rely on several items for its proffer, including investigative reports, medical records, criminal histories, social media posts and videos, and other investigative techniques. From these sources, the United States describes the following facts.

### **I. Background of the 1125 Gang**

The 1125 Gang is a group that primarily operates on the west side of Detroit, specifically in the 2nd, 8th, and 12th Precincts, all of which are located within the Eastern District of Michigan. The 1125 Gang formed following the suicide death of Mar'lin King on November 25, 2017, which is why the gang uses the 11/25 date as

its name. Since the formation of the gang, suspected 1125 Gang members or associates have come to the attention of law enforcement following a string of shootings linked through ATF National Integrated Ballistics Information Network, referred to as NIBIN. Suspected 1125 Gang members or associates frequently post on social media photographs of themselves with firearms, using suspected controlled substances, and while displaying signs, comments, or other insignia of gang affiliation. For the purposes of this proffer, D-1 Cortez Blake, D-2 Karamoh Turner, D-3 Semaj Ayers, and D-6 Armond Williams are members of the 1125 Gang. D-4 Maijah Greene and D-5 Shatonna Kimbrough are closely associated with the 1125 Gang through familial relationships.

**II. The defendants are alleged to have kidnapped and beaten an individual they wrongly believed participated in a carjacking.**

1125 Gang member D-1 Cortez Blake was shot by a rival gang during a carjacking on November 14, 2021, around 4:40 p.m. near the intersection of Puritan and Holmur Street, in Detroit, MI, within the Eastern District of Michigan. Police recovered over 40 spent shell casings from this crime scene. While D-1 Cortez Blake was being treated at a nearby hospital just after 5:00 p.m., members of the 1125 Gang kidnapped a person they wrongly believed had participated in the carjacking. The object of the conspiracy was to kidnap and hold the victim against her will to: (1) obtain information from the victim about the carjacking of D-1

Cortez Blake; and (2) retaliate against the victim for the wrong belief that she was also involved in the carjacking.

The gang used a Jeep Cherokee believed to have been driven by 1125 Gang member Carlos Reed to first take the victim to an abandoned area near Joy road in Detroit. The victim was removed from the vehicle by force and assaulted by members of the gang. Here, D-2 Karamoh Turner specifically removed the victim from the vehicle by force and against her will and assaulted her with a firearm. By this point, another vehicle with members of the gang had arrived.

From this location, the victim was placed back into one of the vehicles against her will and both vehicles escorted her to D-1 Cortez Blake's residence in Detroit. Waiting for the victim as she was taken into the house against her will were more members of the gang, to include upwards of 15 men in total to hold the victim against her will. The gang threatened the victim with firearms and some of the men beat her. The victim was forced into a bedroom and at various times 1125 Gang members would check on her. They would also bring her back into the living room to interrogate and beat her. They took her cell phone to see who was involved in the carjacking that left D-1 Cortez Blake shot.

When the victim had her phone temporarily returned to her, she was able to message her mother for help. The victim told her mother in real time that she was being held hostage and that she thought she was going to die. But the victim's

mother could not help. Instead, D-3 Semaj Ayers interrogated and beat the victim. D-6 Armond Williams also interrogated the victim while at least one other member of the conspiracy threatened her with firearms

D-3 Semaj Ayers eventually called to recruit D-4 Maijah Greene and D-5 Shatonna Kimbrough over to the residence. A short time later, about five women arrived at the house and began to hurt the victim even more. They hit her, ripped her hair out, and broke her fingernails. During the assault, the women were yelling at the victim. D-4 Maijah Greene and D-5 Shatonna Kimbrough were at the forefront of this portion of the kidnapping.

D-1 Cortez Blake was discharged from the hospital and arrived at his home where the victim was being held. D-1 Cortez Blake quickly joined the interrogation and beating of the victim. D-1 Cortez Blake discussed the carjacking with the victim, and he told the women to continue to beat the victim. It got to a point where the victim was curled up in a ball on the floor. At one point, D-1 Cortez Blake used the crutches that he was discharged from the hospital with to beat the victim. In total, members of the conspiracy physically beat the victim with their hands, feet, hospital crutches, and a bottle used by D-5 Shatonna Kimbrough.

Eventually, D-1 Cortez Blake ordered the victim against her will back into a vehicle and he had D-4 Maijah Greene and D-5 Shatonna Kimbrough drive her to

provide the location of a known person who members of the conspiracy believed was involved in the carjacking of D-1 Cortez Blake. In the early morning hours of November 15, 2021, the victim was released from her captors and left on a street corner where she was finally able to seek safety with her mother. From there, the victim was able to seek treatment at a hospital and file a police report.

### **III. The gang's retaliation did not stop with the kidnapping.**

On November 14, 2021, and November 15, 2021, at least 7 members of the 1125 gang participated in group Instagram conversations regarding the carjacking of D-1 Cortez Blake and the kidnapping of the victim. Members of the conversation shared Instagram account information of who they suspected might have been involved in the carjacking. The group discussed arming themselves to fight back. The group also discussed how a video of the kidnapping and beating of the victim had been made, and that it needed to be destroyed. One member of the group even correctly used the word “kidnapping” to describe what had happened to the victim. Included in this conversation were defendants D-2 Karamoh Turner and D-6 Armond Williams. And one member of the group messaged that D-3 Semaj Ayers had left his phone there, which is believed to be a reference to D-1 Cortez Blake's residence where the victim was held and beaten.

On November 16, 2021, shots rang out at a residential address connected to a rival gang member who the 1125 Gang suspected had been involved with the

carjacking of D-1 Cortez Blake. The suspected vehicle used to fire the gunshots resembled a black Jeep Cherokee. Upwards of 32 shell casings were recovered by police, and an innocent person was shot. Fortunately, this person survived.

Within minutes of this shooting, two members of the 1125 Gang were victims of a drive-by shooting inside of a Jeep Cherokee located not far from this residential address. Carlos Reed, who had driven the victim of the kidnapping to D-1 Cortez Blake's house just two days before, was shot dead. D-3 Semaj Ayers was also shot, but he fortunately survived. Law enforcement located the abandoned jeep that it is believed they were shot in and recovered shell casings. Of note, the jeep was found in an area right near where D-6 Armond Williams was separately shot on November 11, 2021.

The shell casings from the jeep, along with some of the casings from the shooting at the residence where an innocent person was shot minutes before, were evaluated using the National Integrated Ballistic Information Network (NIBIN). NIBIN technology compares images of submitted ballistic evidence from shooting scenes and recovered firearms and produces a list of possible similar results. A NIBIN lead is an unconfirmed, potential association between two or more pieces of firearm ballistic evidence and is based on a correlation review of the digital images in the NIBIN database. The evidence from the jeep and from the residential shooting scene produced a NIBIN lead.

#### **IV. Conclusion**

Members or associates of the 1125 Gang use violence as a means of intimidation and retaliation for what they view as a form street vengeance. The six defendants currently charged in this case should remain detained. The United States will include in its argument for detention additional defendant-specific factors pursuant to 18 U.S.C. § 3142(g).

Respectfully Submitted,

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United States Attorney

*s/David Cowen*

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Date: November 6, 2022



**Certificate of Service**

I hereby certify that on November 6, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification to the attorneys of record.

*s/David Cowen*

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